

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
SOUTHERN DIVISION**

KATHRYN BAUMAN RUBENSTEIN )  
 )  
 Plaintiff, ) CIVIL ACTION NO.: 1:07-cv-798-MHT  
 )  
 vs. )  
 )  
 BETTY JO BAUMAN, ET AL, )  
 )  
 Defendants. )

**JOINDER OF DEFENDANTS, WALLACE COOLEY, TOM ZIEGENFELDER  
AND ZIEGOOLEY, REALTY, LLC, IN OBJECTION TO PLAINTIFF'S  
MOTION FOR LEAVE TO FILE THIRD AMENDED COMPLAINT**

**COME NOW**, Defendants, Wallace Cooley, Tom Ziegenfelder, incorrectly named as Tom Zeigenfelder, and Ziegooley Realty, LLC, incorrectly named as Zeigooley, Inc., by and through their attorney of record and hereby join in the Objection to Plaintiff's Motion for Leave to File Third Amended Complaint (Doc. 151) filed by Defendants Marilyn Bauman Granger, Alan E. Kamensky, et. al, and hereby adopt by reference the allegations and arguments set forth therein.

**WHEREFORE**, said Defendants respectfully join with the above referenced co-Defendants in urging this Honorable Court to deny Plaintiff's said Motion for the relief as requested.

**DONE** this 3<sup>rd</sup> day of January, 2008.

**PRIM, FREEMAN & MENDHEIM**

/s/ R. Cliff Mendheim

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R. Cliff Mendheim (MEN008)  
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Wallace Cooley, Tom Ziegenfelder and Ziegooley  
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**CERTIFICATE OF SERVICE**

I hereby certify that on January 3, 2008, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to all counsel/parties of record with the following exceptions to be notified via regular U.S. Mail, postage pre-paid:

Kathryn Bauman Rubenstein  
P.O. Box 2243  
Dothan, AL 36302

/s/ R. Cliff Mendheim

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Of Counsel